EXHIBIT 29

P-PUB-0227

From: Jillanne Smith </O=PUBLIX/OU=NAMERICA/CN=RECIPIENTS/CN=XJSS>
To: Chris Hewell
Sent: 8/9/2018 6:03:28 PM
Subject: FW: CS Projects
Attachments: CS-DiversionAnalytics.docx; CS-SigLossReporting.docx; CS-SOM.docx; CS-Training.docx

Should have cc'd you…

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From: Jillanne Smith
Sent: Thursday, August 09, 2018 5:56 PM
To: Dain Rusk; Toan Do; David Kirkus
Cc: William Hammond; Adam Maingot; Jennifer Warren; Ashley Greathouse
Subject: CS Projects

Team,

Attached are our four Controlled Substance projects that I mentioned at our staff meeting. These are one page scope documents with key information to help you understand the project objective, key players, and deliverables, as well as a few other things. I will be contacting some department heads to identify a few of the core team members and/or just to bring awareness of these upcoming projects (Toan, Brian, Warehouse, and LP). Some tasks are in progress already and some need to be kicked off very soon. I'll be working on logistics and project planning with Jennifer and Ashley so that we can plan our project steps and plan for efficient use of resources since there is a little bit of cross-over with a few team members.

We are excited to move forward on these important initiatives. My goal is to have one analyst focused on controlled substances about 70% of the time through the end of the year – including learning & educating herself, managing these projects, keeping others on target with tasks, and performing a lot of project tasks herself. I will also be heavily involved. I'm not sure if I'm overly confident with the timelines or not, but this is our first stab at an estimate. Please note that the completion months indicated in the deliverables section are "completion by" dates, so work will begin before then.

I have reviewed these with Chris since he's been our resident controlled substance expert for some time now. Please take a look at these, come by to discuss with me, or at a minimum please have some feedback, concerns, agreements, questions for the staff meeting on Monday.

Thanks!!

CS-SOM.docx

CS-DiversionAnalytics.docx

PLAINTIFF TRIAL EXHIBIT
P-01367

CS-SigLossReporting.docx

CS-Training.docx

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CS – Diversion Analytics		Scope Document	
Revision date	8/9/18	**Project Sponsor**	Dain Rusk
Project Manager	Jennifer Warren	**Project Oversight**	Jillanne Smith
Core Team **Other team resources**	**Pharmacy Procurement:** Chris Hewell, Jeremy Buttler **Pharmacy Operations:** Toan Do/TBD **Compliance:** Jillanne Smith **LP:** John Hawthorne/TBD (OI-Comply & reporting to LP) **Managed Care:** Kim Bone (prescriber license verification) **Pharmacy Tech:** Brian Geoghegan (data mining or data base efficiencies) **Pharmacy IT:** Georgeanne Huskey (license verification data extract or feeds)	**Legal Advisors** **Other reviewers or stakeholders**	Bill Hammond Adam Maingot David Kirkus Brian Geoghegan John Hawthorne Georgeanne Huskey
Objective	Develop and implement diversion analytics using our own data, as well as using tools we can leverage with existing vendor relationships (e.g., OI, IMS) to improve identification of potential opportunities and risks for diversion at any of our locations, including our pharmacy warehouse. Ultimately, implement standardized analytics and analysis, as well as procedures to initiate investigative and reporting procedures when necessary.		
Scope	• Retail and warehouse • Prescriber license verification • Diversion not only by theft, but fraud and doctor shopping, etc. • Consider use of a consultant to provide expertise on analytics and possibly process evaluation/audit		
Deliverables	1. Evaluate existing metrics and reporting process, identify improvements and implement– **Aug.** 2. Evaluate consultants specializing in division analytics & controlled substance auditing (IMS, other?) – **Sept.** 3. Implement a short-term prescriber license verification solution & establish plans for a long-term integrated solution in the future – **Sept.** 4. Evaluate analytical tools available through current vendor relationships (e.g., OI Comply, Other?) and/or development of tools – **Sept.** 5. Develop standard metric measures, processes for analyzing & reporting, as well as standards for documenting and maintaining results – **Oct/Nov** 6. Implement solutions, as well as methods to keep up with diversion tactics so we can proactively adjust/add metrics - **Nov**		
Constraints	Dpt. resource capacity – one Compliance Analyst will be about 70% focused on Controlled Substances through year end and then additional resources may be necessary to maintain various programs/processes around Controlled Substance risk evaluation and controls.		
Assumptions	• Prescriber license verification will produce red flags that may result in an internal investigation of diversion. • Contracting will be completed swiftly for consultant. • Some efforts will be coordinated with CS-SOM and CS-Significant Loss Reporting projects. • Reporting results of analytics can be a simple clean report to the appropriate stake holders or reporting potential risks for further investigation through the proper channels.		

CS – Significant Loss Reporting		Scope Document	
Revision date	8/9/18	**Project Sponsor**	Dain Rusk
Project Manager	Jennifer Warren	**Project Oversight**	Jillanne Smith
Core Team **Other team resources**	**Pharmacy Operations:** POM/Supervisor/ TBD **Pharmacy Warehouse:** Laura Sloan **LP:** John Hawthorne/TBD **Compliance:** Jillanne Smith **Pharmacy Tech:** Brian Geoghegan/TBD **(**data mining or data base efficiencies)	**Legal Advisors** **Other reviewers or stakeholders**	Bill Hammond Adam Maingot Toan Do Chris Hewell Brian Geoghegan John Hawthorne Mark Shaia
Objective	Implement centralized significant loss reporting to improve effectiveness of compliance with DEA and state regulations. Ultimately, implement a process where discovered losses (e.g., theft, unaccounted for variances) are reported centrally for timely internal and DEA reporting, as well as, investigative tracking, final reporting, and process/procedure remediation.		
Scope	• Losses from any facility, including warehouse • State and Federal regulations		
Deliverables	1. Assess & clearly define requirements of DEA and state regulations – **Sept.** 2. Identify potential sources of significant loss discovery (e.g., LP, Ops, investigation) and develop a process to notify Pharmacy Compliance and Regulatory Affairs – **Sept.** 3. Identify method and process of reporting to appropriate internal stakeholders and external agencies (who, does what, when and how) – **Sept** 4. Develop a significant loss assessment tool to execute reporting requirements, both initially, and after final investigation – **Oct .** 5. Develop tracking and reporting database – **Nov.** 6. Execute centralization of processes from notifications, assessment, reporting, & tracking **– Nov.**		
Constraints	Dpt. resource capacity – one Compliance Analyst will be about 70% focused on Controlled Substances through year end and then additional resources may be necessary to maintain various programs/processes around Controlled Substance risk evaluation and controls		
Assumptions	Indicators of significant losses through diversion will be identified by processes developed by the CS –SOM and CS – Diversion Analytics teams, so these programs really are (and need to be) integrated with each other.		

CS – Training		Scope Document	
Revision date	8/9/18	**Project Sponsor**	Dain Rusk
Project Manager	Ashley Greathouse	**Project Oversight**	Jillanne Smith
Core Team **Other team resources**	**Pharmacy Operations:** Pharmacy Supervisor/PM/TBD **Central Pharmacy:** Debbie Carney **Integrated Care:** Francine Napolitano **Managed Care:** Kimberly Bone (focus on prescription management part of the project) **ETD:** Jennifer McCormick (in-house advanced training development if needed)	**Legal Advisors** **Other reviewers or stakeholders**	Bill Hammond Adam Maingot Toan Do David Kirkus Chris Hewell
Objective	Develop and implement a comprehensive training solution with an offering that includes red flag identification balanced with patient healthcare responsibilities, as well as PDMP report analysis, controlled substance & opioid prescription management, and how to report potential concerns and issues. Ultimately, this project will result in a training program, as well as policies around all of these areas and implementation of tools (e.g., PDMP reporting, opioid claim assistance) to assist with everyday practice and compliance.		
Scope	• Training provider RFP (Conduent, Pharmacist Letter, other) • PDM reporting evaluation & solution (this solution will not be integrated with ERx – that will be a future integration with McKesson) • Controlled substance & opioid prescription management assistance for pharmacists/techs • Execution of Pharmacist Letter and use of their controlled substance training and reference tools		
Deliverables	Training & policy 1. Identify all areas of training and policy development needed – **Sept.** 2. Execute Pharmacist Letter agreement & set up for use - **Oct** 3. Search for off the shelf training solutions (tie this into a training provider RFP) – **Oct/Nov** 4. Develop comprehensive training plan (include Narcan work to-date) – **Nov** 5. Develop policy (and update as needed) – **Oct/Nov** 6. Identify training solution & prepare development & implementation – **Nov/Dec** 7. Implement solutions – **Feb/March** PDMP & opioid management: 1. Identify PDMP report tool solution – **Aug** 2. Identify & implement PDMP report & analysis solution – **Nov** 3. Identify controlled substance and opioid prescription management needs and design processes, edits, tools, etc. to assist with daily management – **Sept.** 4. Implement opioid management tools, processes, edits, etc. – **Oct/Nov**		
Constraints	Contracting will be completed swiftly for PDMP report tool, Pharmacist Letter agreement, and possible new/additional training provider.		
Assumptions	The following teams will have significant input to this training team - CS-SOM, CS – Diversion Analytics, and CS - Significant Loss Reporting.		

CS - SOM		Scope Document	
Revision date	8/9/18	**Project Sponsor**	Dain Rusk
Project Manager	**Compliance:** Jennifer Warren	**Project Oversight**	Jillanne Smith
Core Team	**Procurement:** Chris Hewell, Jeremy Buttler **Pharmacy Tech:** Brian Geoghegan/TBD **Pharmacy IT:** Todd Sturdivant **Compliance:** Jillanne Smith	**Legal Advisors** **Other reviewers or stakeholders**	Bill Hammond Adam Maingot David Kirkus Toan Do Georgeanne Huskey Laura Slone
Objective	Identify and implement a new SOM solution to improve effectiveness of compliance with DEA regulations. Ultimately, centralize the analysis of orders, identification of suspicious orders, internal reporting, and DEA/state reporting when required.		
Scope	• Mitigate current risks while new SOM solution being developed. • Consider warehouse & ABC ordering in the SOM analysis for each location • Consider organizational changes to support centralized processes • Consider CSOS information as part of the threshold and suspicion assessment • Consider use of a consultant to provide expertise around algorithms, thresholds, incident vs. suspicious order, etc. Note: We are not going to include warehouse stock ordering in this process – that will be a separate effort in the future. CSOS functions will continue to operate in Procurement.		
Deliverables	1. Evaluate SOM consultant (IMS, other?) – **Aug.** 2. Implement current risk mitigation solutions • assess current policy and processes against regulations - **Aug.** • stop-gap for ABC ordering when warehouse threshold met for pharmacies on OI-replenishment– **Aug.** • update evaluation standards/parameters for threshold/algorithm hits from SOM including the expectation for Supervisors to respond to all threshold/hits using those standards - **Aug.** • update evaluation and assessment standards for potentially suspicious orders and the process/procedures for reporting results internally and/or to the DEA - **Aug.** • establish document retention and tracking metrics – **Sept.** 3. Prepare Compliance & Regulatory Affairs to take on centralization – education, resource established, etc. – **Sept/Oct.** 4. Develop tracking, retention, and reporting processes/database, etc. – **Oct.** 5. Execute centralized SOM analysis and reporting within the Pharmacy Compliance & Regulatory Affairs department **– Nov.** 6. Identify and implement New SOM system/processes **– Feb**.		
Constraints	• OI tool development timeline. • Dpt. resource capacity –one Compliance Analyst will be about 70% focused on Controlled Substances through year end and then additional resources may be necessary to maintain various programs/processes around Controlled Substance risk evaluation and controls.		
Assumptions	• IT resources will be available to prioritize development & implementation. • Contracting will be completed swiftly for both a consultant, as well as the OI SOM solution. • OI-Replenishment rollout will be advanced to meet the ABC stop-gap until a new SOM is implemented. • Analytics input will come from the CS – Diversion Analytics team.		